

LOWELL DECL. EX. 69

Exhibit 43

In the U.S. District Court
District of Columbia

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:
Shabtai Scott Shatsky, et :
al :
:
v. : NO. 1:02cv02280
:
The Syrian Arab Republic, :
et al :
:
-----X

February 5, 2013

DEPOSITION OF:

Steven Braun,

a witness, called by counsel pursuant to notice,
commencing at 9:14 a.m., which was taken at Miller
and Chevalier, 655 15th Street, NW, Washington, DC
20005-5701

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<p>1 A. I don't remember.</p> <p>2 Q. Did you work for them in 2008?</p> <p>3 A. Possibly. I don't remember the exact</p> <p>4 dates. I don't want to give you wrong information.</p> <p>5 Q. Give me your best guess.</p> <p>6 MR. STEINER: Don't guess.</p> <p>7 Objection. You don't want him to guess.</p> <p>8 MR. HILL: I'd like his best estimate</p> <p>9 that he worked for this company.</p> <p>10 BY MR. HILL:</p> <p>11 Q. What's your best estimate of the year you</p> <p>12 worked for this company?</p> <p>13 A. 2006, 2007.</p> <p>14 Q. How long did you work for Telecon?</p> <p>15 A. I think six or eight months.</p> <p>16 Q. Why did you leave that position?</p> <p>17 A. They couldn't pay me any more.</p> <p>18 Q. The business was failing?</p> <p>19 A. The business wasn't doing well when I</p> <p>20 joined the company.</p> <p>21 Q. What was your next employment after</p>	<p>1 you were being let go?</p> <p>2 A. No.</p> <p>3 Q. Did anyone tell you it was because of your</p> <p>4 job performance?</p> <p>5 A. No.</p> <p>6 Q. What was your next employment after Konika</p> <p>7 Minolta?</p> <p>8 A. Comfort Living.</p> <p>9 Q. What's the business of Comfort Living?</p> <p>10 A. Importing memory foam mattresses, sleeping</p> <p>11 pillows and medical cushions.</p> <p>12 Q. What was your position?</p> <p>13 A. I was owner, partner.</p> <p>14 Q. What was the name of your partner?</p> <p>15 A. Judah Wilbur.</p> <p>16 Q. Do you know where Mr. Wilbur resides</p> <p>17 today?</p> <p>18 A. Karnei Shomron.</p> <p>19 Q. Are you still in business with Mr. Wilbur</p> <p>20 today?</p> <p>21 A. No.</p>
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<p>1 Telecon?</p> <p>2 A. Konika Minolta.</p> <p>3 Q. What's the business of that company?</p> <p>4 A. Sell black and white and color digital</p> <p>5 copiers.</p> <p>6 Q. What was your position for Konika Minolta?</p> <p>7 A. Product marketing manager.</p> <p>8 Q. How long did you hold that position?</p> <p>9 A. I think two and a half years.</p> <p>10 Q. Approximately what years did you work for</p> <p>11 Konika Minolta?</p> <p>12 A. I think 2007, 2008. I'm not 100 percent</p> <p>13 positive.</p> <p>14 Q. Why did you leave Konika Minolta?</p> <p>15 A. I was let go.</p> <p>16 Q. Were you told why you were being let go?</p> <p>17 A. They let go a number of people, including</p> <p>18 myself. I wasn't told specifically. I thought I</p> <p>19 was doing a very good job. They were just trying to</p> <p>20 cut expenses.</p> <p>21 Q. Did anyone at Konika Minolta tell you why</p>	<p>1 Q. When did your business with him end?</p> <p>2 A. The end of 2010.</p> <p>3 Q. How did your partnership with Mr. Wilbur</p> <p>4 terminate?</p> <p>5 A. I wasn't getting along with him and I</p> <p>6 offered to buy his share of the business. He</p> <p>7 refused so I suggested he buy my share of the</p> <p>8 business.</p> <p>9 Q. Did he agree to buy you out?</p> <p>10 A. Yes.</p> <p>11 Q. When did he buy you out of that business?</p> <p>12 A. End of 2010.</p> <p>13 Q. Approximately how much money did you</p> <p>14 receive for that buy-out?</p> <p>15 A. 55,000 shekels.</p> <p>16 Q. Have you worked since that business ended,</p> <p>17 since your involvement in that business ended?</p> <p>18 A. Not regularly.</p> <p>19 Q. Tell me what work you've done since the</p> <p>20 buyout of the business.</p> <p>21 A. Worked as a guard at building sites,</p>

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<p style="text-align: right;">Page 38</p> <p>1 people doing renovations on their homes, delivering</p> <p>2 flowers, doing internet research, sourcing products</p> <p>3 for companies in China.</p> <p>4 Q. Have you been an employee of any company</p> <p>5 for any of the jobs you've just described?</p> <p>6 A. No.</p> <p>7 Q. So this has been independent contracting,</p> <p>8 so to speak?</p> <p>9 A. So to speak.</p> <p>10 Q. Are you currently working anywhere?</p> <p>11 A. No.</p> <p>12 Q. Are you currently looking for work?</p> <p>13 A. Yes.</p> <p>14 Q. How long have you been actively looking</p> <p>15 for work?</p> <p>16 A. Two years.</p> <p>17 Q. You are looking for a full time position</p> <p>18 but doing these things in the interim, is that fair</p> <p>19 to say?</p> <p>20 A. That is fair to say.</p> <p>21 Q. We're here today because you were injured</p>	<p style="text-align: right;">Page 40</p> <p>1 blood pressure prior to that date?</p> <p>2 A. No.</p> <p>3 Q. Had you ever been diagnosed as having high</p> <p>4 cholesterol prior to that date?</p> <p>5 A. No.</p> <p>6 Q. Were you on any regular medications as of</p> <p>7 February 16, 2002?</p> <p>8 A. No.</p> <p>9 Q. On February 16, 2002 did you see the</p> <p>10 person or persons who caused the explosion that day?</p> <p>11 A. No.</p> <p>12 Q. It's fair to say you are unable to</p> <p>13 identify the person or persons who caused the</p> <p>14 explosion, is that correct?</p> <p>15 MR. STEINER: Objection.</p> <p>16 THE WITNESS: I don't know what you</p> <p>17 mean by "identify."</p> <p>18 BY MR. HILL:</p> <p>19 Q. You can't say "this is the person that did</p> <p>20 it because I saw him on the scene that day,"</p> <p>21 correct?</p>
<p style="text-align: right;">Page 39</p> <p>1 in a bombing that took place on February 16, 2002.</p> <p>2 I want to ask you some questions about what</p> <p>3 happened that day and about your health as a result</p> <p>4 of that.</p> <p>5 A. Okay.</p> <p>6 Q. Prior to that date, February 16, 2002, had</p> <p>7 you ever had any mental illness of any kind?</p> <p>8 A. No.</p> <p>9 Q. Had you ever been depressed prior to that</p> <p>10 date?</p> <p>11 A. No.</p> <p>12 Q. Had you ever seen any mental health</p> <p>13 professional prior to February 16, 2002?</p> <p>14 A. No.</p> <p>15 Q. Prior to February 16, 2002 did you have</p> <p>16 any health issues?</p> <p>17 A. No.</p> <p>18 Q. Did you have any hypertension prior to</p> <p>19 that date?</p> <p>20 A. Not that I was aware of.</p> <p>21 Q. You had not been diagnosed as having high</p>	<p style="text-align: right;">Page 41</p> <p>1 A. Correct.</p> <p>2 Q. Did you lose consciousness at the time of</p> <p>3 that explosion?</p> <p>4 A. No.</p> <p>5 Q. Can you describe for me what injuries you</p> <p>6 sustained in the explosion?</p> <p>7 A. I'll describe what I was doing leading up</p> <p>8 to the terrorist suicide bomber.</p> <p>9 Q. You are welcome to answer however you</p> <p>10 want.</p> <p>11 All I'm asking for is the nature of your</p> <p>12 injuries. If you'll tell me where you were struck</p> <p>13 and how you were injured, that's what the pending</p> <p>14 question is.</p> <p>15 A. I was standing almost in front of the</p> <p>16 jewelry store in the mall in Karnei Shomron. All of</p> <p>17 a sudden I heard the explosion.</p> <p>18 I saw blue, white flashing of light. I was</p> <p>19 pushed back from the force of the blast two or three</p> <p>20 steps and then I felt tremendous pain in my leg,</p> <p>21 excruciating pain.</p>

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<p>1 I looked down on my leg because I didn't</p> <p>2 know exactly -- I was in shock and I saw a lot of</p> <p>3 blood and guts on my pants leg. I thought it was my</p> <p>4 blood and guts.</p> <p>5 Again, I was in a lot of pain so I took my</p> <p>6 pants off to see if my leg was hanging from a</p> <p>7 thread. I had no idea because I was in a lot of</p> <p>8 pain.</p> <p>9 Then I realized it's not my blood and guts,</p> <p>10 it's probably the blood and guts of the suicide</p> <p>11 bomber and possibly other people that were murdered</p> <p>12 or injured in the attack, the terrorist attack.</p> <p>13 I saw that my leg around over here in my</p> <p>14 thigh was badly bruised. It was bleeding a little</p> <p>15 bit. I had some lacerations.</p> <p>16 MR. STEINER: Indicating proximal</p> <p>17 femur right side.</p> <p>18 BY MR. HILL:</p> <p>19 Q. Have you finished your answer?</p> <p>20 A. And then later on -- I'm just skipping now</p> <p>21 because I'm answering your question -- later on I</p>	<p>1 A. Both legs, yes.</p> <p>2 Q. Apart from your legs had you received any</p> <p>3 other injuries as a result of the blast?</p> <p>4 MR. STEINER: Objection.</p> <p>5 THE WITNESS: Those were the physical</p> <p>6 injuries.</p> <p>7 BY MR. HILL:</p> <p>8 Q. You weren't physically injured in your</p> <p>9 head, arms, upper torso?</p> <p>10 A. As far as I know, no.</p> <p>11 Q. On your legs the injuries were, I believe</p> <p>12 you were indicating your right thigh, is that</p> <p>13 correct?</p> <p>14 A. Right.</p> <p>15 Q. Did you receive any injuries below the</p> <p>16 knees on either leg?</p> <p>17 A. Not that I'm aware of.</p> <p>18 Q. Do you have any injuries to your hips or</p> <p>19 to your buttocks as a result of the blast?</p> <p>20 A. No.</p> <p>21 Q. You mentioned that you had some shrapnel</p>
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<p>1 was taken to the hospital, the emergency room, and</p> <p>2 the doctors examined my ears to see if I had damage</p> <p>3 in my eardrums.</p> <p>4 Apparently I didn't because I had a lot of</p> <p>5 wax in my ears and then they told me to take my</p> <p>6 pants off, they wanted to examine both my legs.</p> <p>7 I said it's just this leg. They said we</p> <p>8 have to examine it. I didn't really want to take my</p> <p>9 pants off. They said take your pants off or we'll</p> <p>10 take your pants off.</p> <p>11 I took my pants off and my other leg was</p> <p>12 injured also, also bruised, lacerations and</p> <p>13 shrapnel.</p> <p>14 They also X-rayed me to see if I had any</p> <p>15 internal damage from the blast. That was my</p> <p>16 physical, the extent of my physical injury.</p> <p>17 Q. Initially on the scene you realized you</p> <p>18 were wounded in your right leg, is that correct?</p> <p>19 A. Correct.</p> <p>20 Q. Then at the hospital you realized you had</p> <p>21 also been wounded in your left leg?</p>	<p>1 in your leg, is that correct?</p> <p>2 A. Correct.</p> <p>3 Q. Which leg did you have the shrapnel?</p> <p>4 A. Like some glass, stuff like that.</p> <p>5 Q. What do you mean by "blast stuff"?</p> <p>6 A. Glass.</p> <p>7 Q. You had some glass in both legs, is that</p> <p>8 correct?</p> <p>9 A. As far as I know. They cleaned it out.</p> <p>10 Q. Do you still have any shrapnel or glass in</p> <p>11 your body today?</p> <p>12 A. No, not that aware of.</p> <p>13 Q. Did you have any in your body after you</p> <p>14 left the hospital that night?</p> <p>15 A. As far as I know, no.</p> <p>16 Q. You were eventually transported to the</p> <p>17 hospital that day?</p> <p>18 A. That night, by ambulance.</p> <p>19 Q. Which hospital did you go to?</p> <p>20 A. Tel HaShomer.</p> <p>21 Q. Do you know the name of the doctor or</p>

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<p style="text-align: right;">Page 46</p> <p>1 doctors who attended you?</p> <p>2 A. No idea.</p> <p>3 Q. Did you stay in the hospital overnight?</p> <p>4 A. They wanted me to. I really didn't want</p> <p>5 to. I wanted to go home, be with my wife and</p> <p>6 family.</p> <p>7 I just thought that would be better for me.</p> <p>8 At the beginning they insisted, they wanted to keep</p> <p>9 me overnight for observation. In the end they said</p> <p>10 I could go home.</p> <p>11 Q. So you did eventually go home that night?</p> <p>12 A. Correct.</p> <p>13 Q. Were you able to walk when you left the</p> <p>14 hospital that night?</p> <p>15 A. I think so. I don't remember. I don't</p> <p>16 know if I went by wheelchair or walked.</p> <p>17 Q. Did you use a wheelchair at home?</p> <p>18 A. No.</p> <p>19 Q. I understand you were also able to give</p> <p>20 first aid to some of the people at the scene, is</p> <p>21 that correct?</p>	<p style="text-align: right;">Page 48</p> <p>1 the blast that night?</p> <p>2 A. I'm not sure. The reason being after the</p> <p>3 blast it blew out all the lights so it became very</p> <p>4 dark, difficult to see anything.</p> <p>5 When it happened, I got a grip on myself and</p> <p>6 realized it was a bomb that went off, everybody that</p> <p>7 was in the food court was just lying there. I</p> <p>8 thought they were all dead at the beginning.</p> <p>9 I couldn't recognize anybody because there</p> <p>10 was residue of the explosion, of the blast.</p> <p>11 Everybody's faces and their skin, everything was</p> <p>12 like grayish black.</p> <p>13 Even people that I went up to, it took me a</p> <p>14 while to realize who they were because I just didn't</p> <p>15 recognize them because of the blast.</p> <p>16 Did I specifically realize I saw Keren</p> <p>17 Shatsky, no. Maybe I did but I didn't realize it</p> <p>18 was her.</p> <p>19 Q. You may have seen her that night but you</p> <p>20 did not recognize her as being Keren Shatsky at the</p> <p>21 time, is that correct?</p>
<p style="text-align: right;">Page 47</p> <p>1 A. Yes.</p> <p>2 Q. You are a plaintiff in the lawsuit. I</p> <p>3 want to ask you about whether you saw any of the</p> <p>4 other plaintiffs after the blast that night. Do you</p> <p>5 believe you saw Keren Shatsky that day after the</p> <p>6 blast?</p> <p>7 A. I'd like to explain what I saw relating to</p> <p>8 your question.</p> <p>9 Q. Mr. Braun, the way this works is I get to</p> <p>10 ask the questions and you give the answers. Your</p> <p>11 lawyer will have a chance to ask questions later if</p> <p>12 he chooses to do so. I don't want to keep you here</p> <p>13 any longer than necessary. Just respond to my</p> <p>14 questions.</p> <p>15 MR. STEINER: Just answer the</p> <p>16 question.</p> <p>17 You don't have to give an explanation</p> <p>18 of what you are answering. Just answer.</p> <p>19 MR. HILL: Let me pose a question.</p> <p>20 BY MR. HILL:</p> <p>21 Q. Do you believe you saw Keren Shatsky after</p>	<p style="text-align: right;">Page 49</p> <p>1 A. Correct.</p> <p>2 Q. Do you believe you saw Rachel Thaler after</p> <p>3 the blast?</p> <p>4 A. The same response.</p> <p>5 Q. You may have seen Rachel Thaler after the</p> <p>6 blast but you did not recognize her as Rachel Thaler</p> <p>7 at the time?</p> <p>8 A. Yes.</p> <p>9 Q. Do you believe you saw Leor Thaler after</p> <p>10 the blast?</p> <p>11 A. The same response.</p> <p>12 Q. You may have seen Leor Thaler that night</p> <p>13 but you did not recognize him as such?</p> <p>14 A. Correct.</p> <p>15 MR. STEINER: Objection.</p> <p>16 THE WITNESS: Yes.</p> <p>17 MR. HILL: What's the objection?</p> <p>18 MR. STEINER: It's your</p> <p>19 characterization of what he said. His explanation</p> <p>20 of why is sort of different. You are generalizing</p> <p>21 it in your characterization and asking him if that's</p>

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<p>1 is that correct?</p> <p>2 A. Correct.</p> <p>3 Q. Do you know the name of any of the</p> <p>4 emergency personnel that arrived?</p> <p>5 A. Yes.</p> <p>6 Q. Tell me the names of the people that you</p> <p>7 knew that were there that night responding to the</p> <p>8 bombing.</p> <p>9 A. Rafi Georgie, Yonaton Braun, Yossi Klavin,</p> <p>10 Amos Sarid. There were a lot more.</p> <p>11 Q. Those are the names that you currently</p> <p>12 recollect?</p> <p>13 A. Correct.</p> <p>14 Q. Is Yonaton Braun your son?</p> <p>15 A. Yes.</p> <p>16 Q. Was he -- what kind of a job did he have</p> <p>17 at the time?</p> <p>18 A. He was a high school student that trained</p> <p>19 to be a paramedic with MADA.</p> <p>20 Q. Did any of these individuals treat you on</p> <p>21 the scene?</p>	<p>1 ambulances or other medical personnel to arrive</p> <p>2 after the bombing?</p> <p>3 A. Almost no time.</p> <p>4 Q. Are you aware of any evidence that Keren</p> <p>5 Shatsky was experiencing any conscious pain or</p> <p>6 suffering between the time of the blast and the time</p> <p>7 of her death?</p> <p>8 MR. STEINER: Objection.</p> <p>9 THE WITNESS: I have no idea.</p> <p>10 BY MR. HILL:</p> <p>11 Q. Are you aware of any such evidence?</p> <p>12 MR. STEINER: Objection.</p> <p>13 THE WITNESS: I'm not aware.</p> <p>14 BY MR. HILL:</p> <p>15 Q. You are not aware of any evidence that</p> <p>16 Keren Shatsky experienced any conscious pain and</p> <p>17 suffering between the time of the blast and the time</p> <p>18 of her death, is that correct?</p> <p>19 MR. STEINER: Objection.</p> <p>20 THE WITNESS: You asked me if I saw</p> <p>21 her. I don't know if --</p>
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<p>1 A. My son did.</p> <p>2 Q. What did your son do to treat you?</p> <p>3 A. He cut the pants by my leg to examine the</p> <p>4 injury and told me I have to go to the hospital.</p> <p>5 Q. Do you recollect your son saying anything</p> <p>6 to you at that time other than you needed to go to</p> <p>7 the hospital?</p> <p>8 A. I'm sure something but I don't recollect</p> <p>9 what else he said.</p> <p>10 Q. After your son treated you did you, in</p> <p>11 fact, go to the hospital?</p> <p>12 A. I was transported by ambulance to the</p> <p>13 hospital.</p> <p>14 Q. What is your best estimate of how long</p> <p>15 between the time of the blast and the time you left</p> <p>16 the scene in the ambulance, how much time elapsed?</p> <p>17 A. 45 minutes, an hour.</p> <p>18 Q. Were other injured people evacuated prior</p> <p>19 to that time?</p> <p>20 A. Yes.</p> <p>21 Q. How long do you think it took for the</p>	<p>1 MR. STEINER: Just answer.</p> <p>2 THE WITNESS: I have no idea.</p> <p>3 BY MR. HILL:</p> <p>4 Q. Did you hear anything that indicated that</p> <p>5 she was experiencing conscious pain and suffering</p> <p>6 that night?</p> <p>7 A. I have no idea.</p> <p>8 Q. I'm just trying to make sure for the</p> <p>9 record that I've exhausted your recollection.</p> <p>10 I apologize that I need to ask you these</p> <p>11 questions.</p> <p>12 A. I understand.</p> <p>13 Q. Are you aware of any evidence that Rachel</p> <p>14 Thaler experienced any conscious pain and suffering</p> <p>15 at the scene that night?</p> <p>16 A. I'm not aware but she didn't die right</p> <p>17 away. Could very well be that she did.</p> <p>18 Q. You are not aware of any evidence that she</p> <p>19 was conscious after the blast, correct?</p> <p>20 MR. STEINER: Objection.</p> <p>21 A. Correct.</p>

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1 Q. You described earlier the injuries that
2 you sustained to your legs.

3 How long approximately did it take you to
4 heal from those injuries?

5 **A. I think six to eight weeks.**

6 Q. Since that six to eight week period has
7 concluded have you had any difficulty as a result of
8 the physical injuries to your legs?

9 **A. Well, I believe that because of the**
10 **traumatic experience that I had, I had a stroke**
11 **about two and a half years ago because of high blood**
12 **pressure which I didn't realize I had and I believe**
13 **that it was related to those injuries, physical and**
14 **psychological.**

15 Q. Do you believe that the shrapnel and glass
16 that were put into your legs by the bombing, that
17 those are somehow related to your later stroke?

18 MR. STEINER: Objection.

19 THE WITNESS: I believe that the
20 experience, the unpleasant experience I had of being
21 at the scene of a terrorist bombing attack led to me

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1 having high blood pressure and then leading to a
2 stroke because of the high blood pressure.

3 BY MR. HILL:

4 Q. You believe the whole experience led to
5 high blood pressure which led to a stroke, correct?

6 **A. Yes.**

7 Q. You are not saying the fact that metal or
8 glass was in your legs caused the stroke, right?

9 MR. STEINER: Objection.

10 THE WITNESS: I'm not saying that
11 specifically.

12 BY MR. HILL:

13 Q. I understand. Do the physical injuries to
14 your legs impair your daily activities in any way?

15 **A. No.**

16 Q. They don't prohibit you from walking or
17 running or anything like that, correct?

18 **A. Correct.**

19 MR. HILL: Let's go off the record
20 for five minutes.

21 (Whereupon, a recess was taken from

1 10:06 a.m. to 10:18 a.m.)

2 BY MR. HILL:

3 Q. Mr. Braun, do you believe that you have a
4 mental illness as a result of the attack on
5 February 16, 2002?

6 MR. STEINER: Objection.

7 THE WITNESS: No.

8 BY MR. HILL:

9 Q. Have you had any psychiatric or
10 psychological counseling or other treatment since
11 the attack of February 16, 2002?

12 **A. Yes.**

13 Q. Can you describe that treatment for me?

14 **A. I went to group therapy, people that were**
15 **either involved or lived in the community that**
16 **thought they needed, you know, to speak with a**
17 **psychologist.**

18 Q. How many occasions did you attend the
19 group therapy sessions?

20 **A. Two or three times.**

21 Q. How soon after the events of February 16,

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1 2002 did you attend those sessions?

2 **A. Soon after. I don't recall. I don't**
3 **recall exactly but it was sooner than later.**

4 Q. You said you went on two or three
5 occasions. Who was facilitating this group therapy?

6 **A. The person's name?**

7 Q. Yes.

8 **A. Miriam Shapiro.**

9 Q. Did Ms. Shapiro facilitate all of the
10 sessions you attended?

11 **A. I think so.**

12 Q. Do you know the names of the other people
13 that were in the group?

14 **A. Just one person that I recall.**

15 Q. Who is that?

16 **A. The owner of the pizza store in the mall.**

17 Q. What is his or her name?

18 **A. Amnon. I don't know his last name.**

19 Q. Were there only men or was it men and
20 women?

21 **A. I believe men and women.**

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<p>1 what I remember.</p> <p>2 Q. Apart from the pain medication and the</p> <p>3 antibiotics, have you taken any other medication as</p> <p>4 a result of the February 16 bombing?</p> <p>5 A. The only medication I take now is</p> <p>6 for -- because of the stroke, I had high blood</p> <p>7 pressure medication.</p> <p>8 Q. What's the name of the high blood pressure</p> <p>9 medication you take?</p> <p>10 A. Tritace, Tritace Comp and Normiten and</p> <p>11 aspirin.</p> <p>12 Q. What condition do you understand the</p> <p>13 Tritace Comp to treat?</p> <p>14 A. High blood pressure.</p> <p>15 Q. How about Normiten?</p> <p>16 A. It's a beta blocker.</p> <p>17 Q. Why do you take that?</p> <p>18 A. For my high blood pressure that I was</p> <p>19 diagnosed with after I had my stroke.</p> <p>20 Q. The aspirin is also for the high blood</p> <p>21 pressure?</p>	<p>1 whole I'm recovered but I personally notice that</p> <p>2 occasionally I might trip but on the whole I walk</p> <p>3 fine.</p> <p>4 BY MR. HILL:</p> <p>5 Q. Have you ever fallen on one of these</p> <p>6 occasions when you've noticed that you were</p> <p>7 tripping?</p> <p>8 A. Almost falling.</p> <p>9 Q. You've never actually fallen and injured</p> <p>10 yourself in one of these episodes?</p> <p>11 A. No.</p> <p>12 Q. Did you go to the hospital when you had</p> <p>13 the stroke?</p> <p>14 A. Yes.</p> <p>15 Q. What hospital did you go to?</p> <p>16 A. Meir.</p> <p>17 MR. HILL: Mr. Steiner, if the</p> <p>18 plaintiff is claiming the stroke is related to the</p> <p>19 bombing in this case I believe we would be entitled</p> <p>20 to receive the records of that treatment.</p> <p>21 I don't believe they've been produced</p>
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<p>1 A. It's to thin out my blood.</p> <p>2 Q. When did you have the stroke?</p> <p>3 A. June two and a half years ago.</p> <p>4 Q. It would have been June of 2010, is that</p> <p>5 right?</p> <p>6 A. I guess so. Sounds right.</p> <p>7 Q. Do you have any permanent impairment as a</p> <p>8 result of the stroke?</p> <p>9 A. No. Sometimes I feel I might be shaky</p> <p>10 with my walking but on the whole, you know.</p> <p>11 Q. Is it fair to say that the stroke is not</p> <p>12 impairing any of your daily activities?</p> <p>13 MR. STEINER: Objection.</p> <p>14 THE WITNESS: I'm functioning.</p> <p>15 BY MR. HILL:</p> <p>16 Q. Sometimes when people have a stroke they</p> <p>17 have difficulty walking or a deformity on their face</p> <p>18 or trouble speaking. You don't have any of those</p> <p>19 symptoms, do you?</p> <p>20 MR. STEINER: Objection.</p> <p>21 THE WITNESS: Like I said, on the</p>	<p>1 and I would, therefore, request to the extent the</p> <p>2 treatment of the stroke, if it is, in fact, a claim</p> <p>3 that plaintiff is making in the case, that those</p> <p>4 records be produced.</p> <p>5 MR. STEINER: We'll take it under</p> <p>6 advisement and ask that you follow up in writing.</p> <p>7 It seems based on the testimony he's</p> <p>8 giving that he does attribute the stroke to the</p> <p>9 incident.</p> <p>10 BY MR. HILL:</p> <p>11 Q. Are you under any other treatment related</p> <p>12 to the stroke?</p> <p>13 A. No.</p> <p>14 Q. Did you have any rehabilitation or therapy</p> <p>15 following the stroke?</p> <p>16 A. At the hospital I saw a physical</p> <p>17 therapist, occupational therapist and they told me</p> <p>18 they didn't think I needed to continue with the</p> <p>19 occupational therapist or physical therapist after I</p> <p>20 leave the hospital because every day I was</p> <p>21 improving. They gave me some exercises to do on my</p>

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<p style="text-align: right;">Page 70</p> <p>1 own.</p> <p>2 Q. How long were you in the hospital?</p> <p>3 A. I think around a week. I don't recall</p> <p>4 exactly.</p> <p>5 Q. Do you believe that your current course of</p> <p>6 treatment has done everything possible to prevent a</p> <p>7 recurrence of the stroke?</p> <p>8 A. Well, my blood pressure is under control</p> <p>9 now because of the medication.</p> <p>10 Q. Had you ever had high blood pressure prior</p> <p>11 to February 16, 2002?</p> <p>12 A. No.</p> <p>13 Q. Were you under regular medical treatment</p> <p>14 prior to that date?</p> <p>15 A. Just go to the doctor once in a while if I</p> <p>16 wasn't feeling well or something, nothing regular.</p> <p>17 Q. Who was your doctor that you would see</p> <p>18 prior to February 16, 2002?</p> <p>19 A. My family doctor was Dr. Barry Cannon.</p> <p>20 Q. Do you still see Dr. Cannon?</p> <p>21 A. Yes.</p>	<p style="text-align: right;">Page 72</p> <p>1 choice in a terrorist suicide bombing, it's not a</p> <p>2 pleasant experience. It's not a pleasant</p> <p>3 experience, what happened to me physically.</p> <p>4 It wasn't a pleasant experience. I thought</p> <p>5 everybody in the food court was killed because I</p> <p>6 didn't see anybody moving or screaming or yelling</p> <p>7 for help immediately afterwards. Psychological</p> <p>8 scars, you know.</p> <p>9 Q. You mentioned that there was a period</p> <p>10 after the explosion where no one was moving or</p> <p>11 screaming, is that correct?</p> <p>12 A. Right.</p> <p>13 Q. How long of a period was that?</p> <p>14 A. I don't know.</p> <p>15 Q. What's your best estimate?</p> <p>16 A. A minute, two minutes.</p> <p>17 Q. Have you sought any mental health</p> <p>18 treatment as a result of this incident?</p> <p>19 A. No.</p> <p>20 Q. Is there anything that prevents you from</p> <p>21 seeing a psychologist or psychiatrist?</p>
<p style="text-align: right;">Page 71</p> <p>1 Q. Is he located in Karnei Shomron?</p> <p>2 A. Yes.</p> <p>3 MR. HILL: Mr. Steiner, since the</p> <p>4 plaintiff has claimed that he developed high blood</p> <p>5 pressure as a result of the attack it appears to me</p> <p>6 that his medical treatment by Dr. Cannon would be</p> <p>7 relevant both for the period prior to the attack and</p> <p>8 subsequently.</p> <p>9 I do not believe those records have</p> <p>10 been produced and I request, to the extent they are</p> <p>11 within Mr. Braun's possession, custody or control --</p> <p>12 MR. STEINER: Take it under</p> <p>13 advisement, ask you to put it in writing.</p> <p>14 BY MR. HILL:</p> <p>15 Q. Do you believe you have any other health</p> <p>16 issues that were related to the explosion on</p> <p>17 February 16, 2002?</p> <p>18 A. Not physical. Possibly psychological.</p> <p>19 Q. What do you mean by psychological issues</p> <p>20 related to the attack?</p> <p>21 A. When one in a participant not of their</p>	<p style="text-align: right;">Page 73</p> <p>1 A. Nothing is preventing me.</p> <p>2 Q. If you were to go see a psychologist or</p> <p>3 psychiatrist would that be covered by the insurance</p> <p>4 in Israel?</p> <p>5 A. Maybe provided by the HMO, not by Bituach</p> <p>6 Leumi.</p> <p>7 Q. You believe your health insurance would</p> <p>8 cover psychological treatment if you wanted to take</p> <p>9 it?</p> <p>10 A. I'm guessing yes but I don't know</p> <p>11 100 percent.</p> <p>12 Q. Do you anticipate any future medical</p> <p>13 expenses as a result of the bombing on February 6,</p> <p>14 2002, for yourself?</p> <p>15 A. Not that I'm aware of.</p> <p>16 Q. Has anyone in your family been mentally</p> <p>17 ill?</p> <p>18 A. No.</p> <p>19 Q. Are you claiming to have lost income as a</p> <p>20 result of the bombing on February 16, 2002?</p> <p>21 A. I think it's related. I was unemployed at</p>

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<p style="text-align: right;">Page 74</p> <p>1 the time.</p> <p>2 I'm sure I wasn't functioning at my best</p> <p>3 when I went for an interview, for instance.</p> <p>4 Q. What do you mean you weren't functioning</p> <p>5 at your best when you went for an interview? What</p> <p>6 do you mean by that?</p> <p>7 A. I wasn't my typical self before the</p> <p>8 bombing as I was after the bombing.</p> <p>9 Again, I don't know specifics but it could</p> <p>10 be I wasn't concentrating, could be I didn't respond</p> <p>11 as well as I would have liked, you know, questions</p> <p>12 that were asked of me in an interview, for example,</p> <p>13 so it could be.</p> <p>14 Q. The bombing took place on February 16,</p> <p>15 2002. How long had you been unemployed as of that</p> <p>16 date?</p> <p>17 A. I don't recall.</p> <p>18 Q. Several months?</p> <p>19 A. I'm sure at least.</p> <p>20 Q. It was several months after that date that</p> <p>21 you got your next job, right?</p>	<p style="text-align: right;">Page 76</p> <p>1 Q. You say base salary and commission. What</p> <p>2 was the approximate base salary?</p> <p>3 A. I didn't get that far.</p> <p>4 Q. Apart from that interview that had to be</p> <p>5 rescheduled as a result of the bombing did you have</p> <p>6 any other interviews between that one and the one</p> <p>7 that eventually led to your next job?</p> <p>8 A. I'm sure I did but again I don't</p> <p>9 specifically remember.</p> <p>10 I remember this one specifically because it</p> <p>11 was scheduled the day after the bombing so it sticks</p> <p>12 in my mind.</p> <p>13 Q. Do you have any idea how much the other</p> <p>14 jobs you were interviewing in that timeframe would</p> <p>15 have paid had you been hired?</p> <p>16 A. Could be 8000 shekels for base salary plus</p> <p>17 commission, percent of the sale.</p> <p>18 Q. Are you thinking of a particular job you</p> <p>19 interviewed in that timeframe that had that sort of</p> <p>20 salary structure?</p> <p>21 A. I'm not thinking of a specific company.</p>
<p style="text-align: right;">Page 75</p> <p>1 A. Yes.</p> <p>2 Q. Did you have job interviews between the</p> <p>3 date of the bombing and the job for which you were</p> <p>4 eventually hired?</p> <p>5 A. I remember that I had an interview the day</p> <p>6 after the bombing which I canceled. After that I</p> <p>7 don't specifically recall. I do recall that I</p> <p>8 rescheduled an interview.</p> <p>9 Q. Did you eventually have the interview that</p> <p>10 was scheduled for February 17, 2002?</p> <p>11 A. Yes.</p> <p>12 Q. What company was that with?</p> <p>13 A. I don't remember the name.</p> <p>14 Q. Did you get that job?</p> <p>15 A. No.</p> <p>16 Q. Do you know what you would have made had</p> <p>17 you got that job?</p> <p>18 A. No.</p> <p>19 Q. Do you have an idea of ballpark or</p> <p>20 estimate of what you would have made at that job?</p> <p>21 A. Base salary and commission. I don't know.</p>	<p style="text-align: right;">Page 77</p> <p>1 Generally that was the type of jobs I was applying</p> <p>2 for.</p> <p>3 Q. What was the target wage you were looking</p> <p>4 for?</p> <p>5 A. Something to that effect.</p> <p>6 Q. When you eventually were hired after the</p> <p>7 bombing how much were you paid?</p> <p>8 A. I think 14,000 shekels a month.</p> <p>9 Q. Remind me which job that was.</p> <p>10 A. I'm thinking now. I don't know exactly.</p> <p>11 Telecon.</p> <p>12 Q. The job you ended up getting at Telecon</p> <p>13 was better than the sort of job you were looking for</p> <p>14 in this timeframe in terms of pay?</p> <p>15 A. In regards to base salary, yes. The</p> <p>16 commission, it wasn't as good because the product</p> <p>17 wasn't really ready to be sold so I didn't make any</p> <p>18 commission because I wasn't able to. The base</p> <p>19 salary was higher and the commission, there was no</p> <p>20 commission.</p> <p>21 Q. Did you ever earn commission at the</p>

1 Telecon job?

2 **A. No.**

3 Q. That was just a salaried position?

4 **A. Supposed to be a salary, base salary and**
5 **commission job.**

6 Q. But it never got to commission because the
7 company didn't succeed?

8 **A. Basically. I left because he wasn't able**
9 **to pay my salary any more.**

10 Q. What were you making at the job you held
11 prior to the bombing?

12 **A. I don't remember exactly. Maybe 12,000**
13 **shekels plus commission.**

14 Q. Which job was that?

15 **A. I think it was SayTek. One second. Wait.**
16 **SayTek was after the bombing. It was probably**
17 **Reshet Keshet.**

18 Q. Was that 12,000 a month plus commission?

19 **A. 10 or 12,000 a month plus commission.**

20 Q. Is there any way to come up with a number
21 for how much less you believe you earned as a result

1 record.

2 THE WITNESS: According to Israeli
3 law I didn't have to keep them.

4 MR. STEINER: Never mind.

5 BY MR. HILL:

6 Q. Do you have any documents showing what
7 you've made since the date of the bombing?

8 **A. Some.**

9 MR. HILL: To the extent that the
10 witness is claiming lost wages obviously his wage
11 history prior to and after the bombing would be
12 relevant and I don't think any of those documents
13 have been produced. To the extent you are pressing
14 a claim for lost income you need to produce those
15 documents.

16 MR. STEINER: I will take it under
17 advisement. I ask you to follow up in writing,
18 please.

19 BY MR. HILL:

20 Q. Mr. Braun, how many lawsuits have you
21 filed as a result of this bombing?

1 of the bombing?

2 **A. I don't know.**

3 Q. Has anyone ever attempted to calculate
4 what your lost earnings are?

5 **A. Not that I'm aware of. Maybe the lawyers**
6 **have a formula but nothing they discussed with me.**

7 Q. Do you have any documents that show what
8 you were making prior to the bombing?

9 **A. I might have or they might have been**
10 **thrown out already.**

11 **Legally I don't have to keep them so I don't**
12 **know that I have them.**

13 MR. HILL: I'm not sure that it's
14 right that you didn't have to keep them but --

15 MR. STEINER: Objection.

16 BY MR. HILL:

17 Q. Do you have any documents --

18 MR. STEINER: Don't take legal advice
19 from him.

20 MR. HILL: I'm just noting my
21 disagreement with the witness' statement for the

1 **A. I believe two.**

2 Q. Do you know who you have sued?

3 **A. The Arab Bank and the PLO.**

4 Q. Why did you sue the Arab Bank?

5 **A. My lawyers believe that they were directly**
6 **involved in funding terrorist activities.**

7 Q. Are you aware of any evidence that the
8 Arab Bank had something to do with the bombing in
9 which you were injured?

10 **A. Not specifically aware. I'm letting the**
11 **lawyers handle it.**

12 Q. Are you generally aware of some evidence
13 that the Arab Bank had something to do with the
14 injuries you sustained on February 16, 2002?

15 **A. I'm not specifically aware. I'm letting**
16 **my lawyers handle it.**

17 Q. I appreciate the answer. You are saying
18 not specifically.

19 I'm trying to find out if you know anything
20 at all about any evidence that the Arab Bank had
21 something to do with your injury.

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1 Do you, in fact, know of any evidence that
2 the Arab Bank is somehow responsible for your
3 injuries?

4 **A. I don't personally know.**

5 Q. Sitting here today you cannot tell me of
6 any evidence that the Arab Bank is responsible for
7 your injuries on February 16, 2002?

8 MR. STEINER: If your answer requires
9 that you reveal the contents of any communications
10 that you had with attorneys, that's what made you
11 aware of any evidence, then I would ask you not to
12 reveal it.

13 THE WITNESS: I'm letting my lawyers
14 handle it.

15 If that's what they believe, that's
16 fine with me.

17 BY MR. HILL:

18 Q. I don't mean to get into what your lawyers
19 believe.

20 I'm just trying to find out you, Mr. Braun,
21 you don't have any evidence that the Arab Bank had

1 to do with the specific attack in which you were
2 injured, any evidence that the PLO had something to
3 do with that specific attack?

4 MR. STEINER: Objection.

5 THE WITNESS: I don't have personal
6 knowledge. I'm having my lawyers handle it.
7 BY MR. HILL:

8 Q. You mentioned that the PLO commits
9 terrorist attacks all the time, in your view. Are
10 you aware of any evidence that the PLO had something
11 to do with this specific attack in which you were
12 injured?

13 **A. I don't have specific personal knowledge
14 of that. I'm having my lawyers handle it.**

15 Q. I understand your lawyers are handling it
16 but sitting here today you cannot point to any
17 evidence that the PLO had something to do with the
18 attack in which you were injured, is that correct?

19 MR. STEINER: Objection.

20 THE WITNESS: I'm not personally
21 aware of it.

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1 something to do with the attack on February 16, is
2 that correct?

3 **A. Not personally.**

4 Q. Are you aware of any evidence that the PLO
5 had something to do with the attack on February 16,
6 2002?

7 **A. The PLO is a terrorist organization. The
8 PLO, you can read the newspapers or watch
9 television. They commit terrorist attacks all the
10 time.**

11 **They honor their martyrs that do terrorist
12 suicide bombings, they pay stipends to their
13 families, they name streets after terrorists, they
14 have parades for them when they are released from
15 Israeli jails for whatever reason.**

16 **The Palestinian Authority policemen have
17 been caught in the acts of committing terrorist
18 attacks.**

19 Q. Have you finished your answer?

20 **A. For now.**

21 Q. Are you aware that the PLO had something

1 BY MR. HILL:

2 Q. You mentioned that the PLO honors martyrs.
3 Are you aware of any evidence of the PLO honoring
4 the person or persons that were responsible for the
5 attack in which you were injured?

6 **A. I'm not aware of it specifically.**

7 Q. You mentioned that the PLO pays stipends
8 to the families of martyrs.

9 Are you aware of any evidence that the PLO
10 has paid a stipend to the family or families of the
11 person --

12 **A. I'm not aware of it but I'm sure it could
13 be checked out.**

14 Q. You are not aware of any such evidence?

15 **A. I'm not aware.**

16 Q. You mentioned that the PLO named streets
17 after terrorists. Are you aware of any evidence
18 that the PLO has named a street after the person or
19 persons responsible for the attack in which you were
20 injured?

21 **A. I'm not personally aware.**

<p style="text-align: right;">Page 86</p> <p>1 Q. You mentioned that the PLO has parades</p> <p>2 when people are released from prison.</p> <p>3 Are you aware of any evidence that a parade</p> <p>4 has been held for someone who was involved in the</p> <p>5 attack on you?</p> <p>6 A. I'm not personally aware.</p> <p>7 Q. Are you aware of whether anyone has been</p> <p>8 arrested in connection with the attack in which you</p> <p>9 were injured?</p> <p>10 A. I recall reading something or hearing on</p> <p>11 the news that a person was caught or killed but I</p> <p>12 don't know the specifics.</p> <p>13 Q. Do you know the name of the person who was</p> <p>14 allegedly caught or killed in connection with the</p> <p>15 attack on you?</p> <p>16 A. No.</p> <p>17 Q. Do you know anything else about the</p> <p>18 capture or killing -- do you know anything about the</p> <p>19 person that was allegedly involved in the attack on</p> <p>20 you being caught or killed other than what you read</p> <p>21 in the newspaper?</p>	<p style="text-align: right;">Page 88</p> <p>1 being caught in the act of committing terrorist</p> <p>2 attacks. Are you aware of any --</p> <p>3 A. I'm not aware.</p> <p>4 Q. Have you now told me about all the</p> <p>5 evidence you are aware of that the PLO may have had</p> <p>6 something to do with the attack in which you were</p> <p>7 injured?</p> <p>8 A. I gave you what I happened to think of now</p> <p>9 when you asked the question.</p> <p>10 Q. Can you think of any other evidence that</p> <p>11 the PLO had something to do with the attack in which</p> <p>12 you were injured?</p> <p>13 A. The PLO commits terrorist attacks in</p> <p>14 general in Israel, throughout Israel.</p> <p>15 It doesn't matter if it's in my community</p> <p>16 over the Green Line, inside the Green Line in a city</p> <p>17 like Tel Aviv or Jerusalem. It's documented in the</p> <p>18 media.</p> <p>19 Q. Any other evidence you can think of that</p> <p>20 the PLO may have had something to do with the attack</p> <p>21 in which you were injured?</p>
<p style="text-align: right;">Page 87</p> <p>1 A. He's from the city of Kalkilya.</p> <p>2 Q. Do you anything else about him other than</p> <p>3 they came from Kalkilya?</p> <p>4 A. No.</p> <p>5 Q. Do you know whether he was, in fact,</p> <p>6 captured or killed?</p> <p>7 A. I don't recall.</p> <p>8 Q. Do you know approximately when you heard</p> <p>9 the person allegedly involved in the attack on you</p> <p>10 had been captured?</p> <p>11 A. I think within a year, within the year of</p> <p>12 the attack.</p> <p>13 Q. Your recollection is that you heard about</p> <p>14 this capture or killing by reading the newspaper, is</p> <p>15 that right?</p> <p>16 A. The internet. I don't specifically</p> <p>17 recall.</p> <p>18 Q. You believe you received it from some</p> <p>19 media source?</p> <p>20 A. Yes.</p> <p>21 Q. You said something about PA policemen</p>	<p style="text-align: right;">Page 89</p> <p>1 A. Not that I can think of at this moment.</p> <p>2 Q. You mentioned you believe the PLO commits</p> <p>3 terrorist attacks in other locations. Is that based</p> <p>4 on anything other than what you've read or watched</p> <p>5 in the media?</p> <p>6 A. I think it's enough that I watched or read</p> <p>7 in the media.</p> <p>8 Q. I'm just trying to make sure you are not</p> <p>9 aware of any evidence other than stuff that you've</p> <p>10 seen on TV or read on the internet or in a newspaper</p> <p>11 indicating that the PLO --</p> <p>12 A. I didn't personally see PLO members</p> <p>13 committing terrorist attacks, if that's your</p> <p>14 question.</p> <p>15 Q. Have you ever spoken to anyone from the</p> <p>16 PLO where they told you they were involved in</p> <p>17 terrorism?</p> <p>18 A. No. Most people I would think who are</p> <p>19 involved in terrorism, you know, don't come up to</p> <p>20 people like me telling me that they are involved in</p> <p>21 terrorism.</p>

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<p>1 Q. Have you ever spoken to anyone from the</p> <p>2 PLO at all?</p> <p>3 A. I've spoken to Arabs. I don't know if</p> <p>4 they are a member of the PLO or not.</p> <p>5 Q. Has any Arab ever told you that the PLO</p> <p>6 was involved in terrorism?</p> <p>7 A. No.</p> <p>8 I want to take a break and go to the</p> <p>9 bathroom.</p> <p>10 MR. HILL: Sure.</p> <p>11 (Whereupon, a recess was taken from</p> <p>12 10:49 a.m. to 10:54 a.m.)</p> <p>13 BY MR. HILL:</p> <p>14 Q. Mr. Braun, apart from what you've read in</p> <p>15 the newspapers or seen in other media are you aware</p> <p>16 of any other evidence that the PLO is involved in</p> <p>17 terrorism?</p> <p>18 MR. STEINER: Objection.</p> <p>19 THE WITNESS: Other than the media,</p> <p>20 no.</p> <p>21 BY MR. HILL:</p>	<p>1 Are you aware of any evidence that any PA</p> <p>2 policemen had something to do with the bombing in</p> <p>3 which you were injured?</p> <p>4 A. Not specifically.</p> <p>5 Q. Are you generally aware of evidence that</p> <p>6 PA employees or policemen are terrorists?</p> <p>7 A. Yes.</p> <p>8 Q. That is something you've read in the news</p> <p>9 media?</p> <p>10 A. Or seen on television or the internet.</p> <p>11 Q. Apart from what you've seen in some form</p> <p>12 of media, be it newspapers, TV, internet, is it fair</p> <p>13 to say you are not aware of any evidence other than</p> <p>14 those media sources that PA policemen or employees</p> <p>15 are terrorists, is that correct?</p> <p>16 A. I'm not a policeman. They don't confide</p> <p>17 in me what they know or don't know about the PLO. I</p> <p>18 know what everybody else can find out from the</p> <p>19 media.</p> <p>20 Q. You are not aware of any evidence apart</p> <p>21 from stuff that you've seen in the media that PA</p>
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<p>1 Q. Are you aware of any evidence that the</p> <p>2 Palestinian Authority had something to do with the</p> <p>3 bombing in which you were injured on February 16,</p> <p>4 2002?</p> <p>5 MR. STEINER: Objection.</p> <p>6 THE WITNESS: Other than what I read</p> <p>7 in the media, the PLO is basically the Palestinian</p> <p>8 Authority, so what I said about the PLO goes for the</p> <p>9 Palestinian Authority.</p> <p>10 Their policemen I do believe are</p> <p>11 terrorists. There's documented proof in the media,</p> <p>12 but other than that I'm not aware of anything.</p> <p>13 BY MR. HILL:</p> <p>14 Q. You mentioned that it's your view that PA</p> <p>15 employees are terrorists.</p> <p>16 Are you aware of any evidence that a PA</p> <p>17 employee had something to do with the bombing in</p> <p>18 which you were injured?</p> <p>19 A. Not specifically.</p> <p>20 Q. You mentioned your belief that PA</p> <p>21 policemen are terrorists.</p>	<p>1 employees or policemen are involved in terrorism,</p> <p>2 correct?</p> <p>3 A. Correct.</p> <p>4 Q. You mentioned that you've seen documented</p> <p>5 proof in the media. Are you thinking of something</p> <p>6 in particular?</p> <p>7 A. There's many, many, many instances. I'm</p> <p>8 not talking about isolated cases. Whether it's a</p> <p>9 shooting or a bombing or something else, I'm not</p> <p>10 thinking of specific occasions because there's</p> <p>11 millions of cases.</p> <p>12 Q. Have you seen any media coverage</p> <p>13 indicating that the PA had something to do with the</p> <p>14 specific bombing in which you were injured?</p> <p>15 A. I don't recall.</p> <p>16 Q. Sitting here today you cannot point me to</p> <p>17 any media account indicating a PA connection to the</p> <p>18 bombing in which you were injured, correct?</p> <p>19 A. No, but you can check on the internet</p> <p>20 yourself. It's accessible to everybody.</p> <p>21 Q. I'm just trying to make sure that you are</p>

1 not aware --

2 **A. I'm not specifically aware in this**
3 **particular case.**

4 Q. I know you know what I'm going to ask.
5 Let me get a clean question out.

6 Sitting here today you are not aware of any
7 media account indicating that the Palestinian
8 Authority had something to do with the bombing in
9 which you were injured, correct?

10 **A. I'm not personally aware. It doesn't mean**
11 **they weren't involved.**

12 Q. Sitting here today you cannot tell me of a
13 media account that implicates the PA in the bombing
14 in which you were injured, correct?

15 MR. STEINER: Objection.

16 THE WITNESS: I didn't specifically
17 check. I'm not aware of it.

18 BY MR. HILL:

19 Q. Are you aware of any evidence that the
20 Syrian Arab Republic had something to do with the
21 bombing in which you were injured?

1 **A. I'm not personally aware.**

2 Q. Do you know if you've sued the Syrian Arab
3 Republic in connection with that bombing?

4 **A. I don't recall. I'm leaving it to my**
5 **lawyers.**

6 Q. Did you authorize a lawsuit against Syria?

7 **A. I do not remember.**

8 Q. You say you are leaving it to your
9 lawyers. Who are your lawyers?

10 **A. Nitzana Darshon Leitner.**

11 Q. Apart from Ms. Leitner are you aware of
12 any other lawyers that you have?

13 **A. Mr. Steiner.**

14 Q. Apart from Mr. Steiner and Ms. Leitner,
15 can you tell me the name of any other lawyer that's
16 represented in connection with --

17 MR. STEINER: Mr. Steiner is counsel
18 just for purposes of these depositions.

19 THE WITNESS: I know that there were
20 other lawyers working on the case.

21 I don't know specifically all the names

1 of the people.

2 BY MR. HILL:

3 Q. Can you tell me any names of any lawyer
4 that's represented you in these cases other than
5 Mr. Steiner and Ms. Leitner?

6 **A. Somebody named David Strachman, I believe**
7 **another name is Tolchin and I don't recall any other**
8 **names.**

9 Q. Does Mr. Strachman still represent you?

10 **A. I don't think so.**

11 Q. Does Mr. Tolchin still represent you?

12 **A. I don't recall.**

13 Q. Have you ever spoken publicly about the
14 events of February 16, 2002?

15 **A. I don't believe so.**

16 Q. Have you ever given any interviews to any
17 press or media outlet in connection with the
18 February 16 bombing?

19 **A. I don't think so.**

20 Q. Have you ever spoken to anyone at the
21 New York Post about this case?

1 **A. No.**

2 Q. Have you spoken to anyone at any newspaper
3 about this case?

4 **A. As far as I know, no.**

5 Q. Have you ever issued any press releases in
6 connection with this lawsuit?

7 **A. No.**

8 **(Pause)**

9 **BY MR. HILL:**

10 Q. Mr. Braun, while we were off the record we
11 were discussing a photograph that Mr. Steiner I
12 believe has on his iPad.

13 We'll get a copy of this and we will mark it
14 as exhibit nine for the purposes of the deposition
15 but since we can't get a hard copy at the moment let
16 me ask you some questions about this.

17 Have you seen this photograph before?

18 **A. I've seen the original before.**

19 Q. Do you possess the original of this
20 photograph?

21 **A. Yes.**

<p style="text-align: right;">Page 118</p> <p>1 MR. STEINER: Objection.</p> <p>2 THE WITNESS: Some jail outside of</p> <p>3 Haifa.</p> <p>4 BY MR. HILL:</p> <p>5 Q. How long were you in jail?</p> <p>6 A. 36 hours.</p> <p>7 Q. Were you released on bail or something?</p> <p>8 MR. STEINER: How long?</p> <p>9 THE WITNESS: 36 hours.</p> <p>10 BY MR. HILL:</p> <p>11 Q. You were released on bail or something</p> <p>12 like that?</p> <p>13 A. Something like that. Personal</p> <p>14 recognizance or something like that.</p> <p>15 Q. Apart from this have you had any other</p> <p>16 run-ins with the law?</p> <p>17 A. No.</p> <p>18 MR. HILL: I don't have any questions</p> <p>19 for Mr. Braun at this time, subject to our</p> <p>20 document --</p> <p>21 MR. STEINER: Did you have a copy of</p>	<p style="text-align: right;">Page 120</p> <p>1 Reporter's Certificate</p> <p>2</p> <p>3 I, the undersigned, Certified Court Reporter,</p> <p>4 do hereby certify that the foregoing transcript of</p> <p>5 testimony was taken by me in stenotype and</p> <p>6 thereafter reduced to print under my direction,</p> <p>7 that said transcript is a full, true and</p> <p>8 substantially accurate record of the proceedings,</p> <p>9 to the best of my ability.</p> <p>10 I do further certify that I am neither counsel</p> <p>11 for, related to, nor employed by any of the parties</p> <p>12 to the action in which this deposition was taken;</p> <p>13 and, further, that I am not a relative or employee</p> <p>14 of any attorney or counsel employed by the parties</p> <p>15 hereto, nor financially or otherwise interested</p> <p>16 in the outcome of the action.</p> <p>17</p> <p>18 /s/ Michael Feuer</p> <p>19 _____</p> <p>20 Certified Realtime Reporter</p> <p>21</p>
<p style="text-align: right;">Page 119</p> <p>1 nine by any chance or we'll make that later?</p> <p>2 MR. HILL: I don't have it yet.</p> <p>3 We'll add it to the record.</p> <p>4 MR. STEINER: I ask for a copy of</p> <p>5 exhibit nine and we reserve our right to review and</p> <p>6 sign the transcript.</p> <p>7 (Deposition adjourned at 11:20 a.m.)</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p>	<p style="text-align: right;">Page 121</p> <p>1 Certificate of Deponent</p> <p>2 I hereby certify that I have read and</p> <p>3 examined the foregoing transcript, and the same</p> <p>4 is a true and accurate record of the testimony</p> <p>5 given by me.</p> <p>6 Any additions or corrections that I feel</p> <p>7 are necessary I will attach on a separate sheet</p> <p>8 of paper to the original transcript.</p> <p>9</p> <p>10 _____</p> <p>11 Signature of witness</p> <p>12 I hereby certify that the individual</p> <p>13 representing him/herself to be the above named</p> <p>14 individual, appeared before me this _____</p> <p>15 day of _____ and executed the above</p> <p>16 certificate in my presence.</p> <p>17</p> <p>18</p> <p>19</p> <p>20 _____</p> <p>21 Notary Public</p>